

Honorable James L. Robart

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NSA SAM,

Plaintiff,

v.

ROBERT D. KELLAMS, a Kent Police
Officer and his marital community; JOHN
PAGEL, a Kent Police Officer and his marital
community; MARK WILLIAMS, a Kent
Police Officer and his marital community;
and CITY OF KENT, a municipal
corporation,

Defendants.

No. 2:16-cv-00811-JLR

STIPULATED MOTION TO ALLOW
RULE 30(b)(6) DEPOSITION TO OCCUR
AFTER DISCOVERY CLOSES

NOTED FOR CONSIDERATION:
March 9, 2017

STIPULATED MOTION

The parties stipulate and jointly request that the Court permit Plaintiff Nsa Sam to take a Rule 30(b)(6) deposition of the City of Kent within two weeks after discovery closes. On February 27, three weeks before the discovery cutoff, Plaintiff properly requested a Rule 30(b)(6) deposition of the City related to training on high-risk stops and training on interpreting an NCIC and WACIC printout. The City's designee to testify regarding these topics has been on leave out of state. He returns to work tomorrow, and is scheduled to work all night prior to

STIPULATED MOTION TO ALLOW RULE 30(b)(6)
DEPOSITION TO OCCUR AFTER DISCOVERY CLOSES
(No. 2:16-cv-00811-JLR) - 1

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each of the two dates Plaintiff's counsel offered for the deposition. The City offered two other dates for the deposition, but Plaintiff's counsel is in California those dates.

Accordingly, good cause having been shown, the parties request the Court permit Plaintiff to take this 30(b)(6) deposition by April 3. The remainder of discovery will still close on March 20 as the Court previously ordered.

DATED: March 9, 2017

CIVIL RIGHTS JUSTICE CENTER,
PLLC
Attorney for Plaintiff Nsa Sam

MILLS MEYERS SWARTLING P.S.
Attorneys for the City of Kent, retired
Sergeant Pagel, retired Officer Kellams, and
Officer Williams

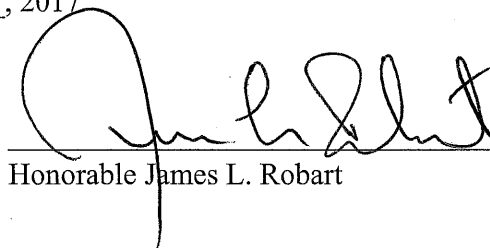
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ORDER

Based on the foregoing, IT IS SO ORDERED.

DATED: 9 March, 2017



Honorable James L. Robart

CERTIFICATE OF SERVICE

I certify that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to:

Ada Ko Wong: ada@akw-law.com, adakowong.esq@gmail.com, paralegal@akw-law.com

Darryl Parker: dparker@civilrightsjusticecenter.com, ogee@civilrightsjusticecenter.com, amichel@civilrightsjusticecenter.com, rstefanski@civilrightsjusticecenter.com

I further certify that I mailed a true and correct copy of the foregoing to the following non-CM/ECF participants:

N/A

Dated this 9th day of March 2017.

s/Anna Armitage

Anna Armitage